

Engineers Oil Company
14837 Blue Stream Avenue
Bakersfield, California 93314
February 24, 2017

W. Dale Harvey
Supervising Engineer
Central Valley Regional Water Quality Control Board

Via email to Dale.harvey@waterboards.ca.gov

Dear Mr. Harvey:

Engineers Oil Company is a small producer with a facility located in the Midway Sunset field in western Kern County. We have several comments regarding draft General Order 3, as follows:

1. **Concern:** The "SCOPE OF GENERAL ORDER COVERAGE" lists five requirements for coverage under General Order 3. The "Evaluation of Produced Water Ponds" for the Engineers Oil Company facility dated May 16, 2016, and provided to the Water Board, demonstrates that there is no threat to groundwater.

Although the operation meets all five requirements, noteworthy is criteria c. that, "*discharge where the first encountered groundwater is of poor quality or there is no first encountered groundwater*". There is no first encountered groundwater.

Despite this, Attachment B would require considerably more analysis at a high cost, but the information would not add anything to the fact that there is no threat to groundwater in this Midway Sunset facility.

Recommendation: A facility that has been demonstrated to meet all five requirements 1a through 1e of General Order 3 should be exempt from unnecessary Attachment B analysis and information.

2. **Concern:** In several situations, an operator would need to provide a plan to the Water Board, but the Executive Officer does not have to make a decision under any schedule. Two examples:

- 8c of Attachment B regarding waste disposal states: "*At least 180 days prior to any solid waste removal and disposal, the Discharger must submit a solids management plan for the Executive Officer's approval*".
- 9b relating to dust control states: "*The Discharger shall submit the management plan 90 days prior to the anticipated discharges and the Executive*

Officer approval of the plan should be prior to commencement of the wastewater application."

Recommendation: All sections like those cited above should allow a plan to be submitted only 30 days in advance of any action at the facility and require the Executive Officer to respond within another 30 days.

3. Concern: Attachment B requires the submission of the plans cited above, but it is not clear if the plans must be submitted each time such an event is contemplated or just once.

Recommendation: The language should clearly state that future actions can be carried out within the scope of an approved plan.

Thank you for the opportunity to comment. If you have any questions, please contact me.

Sincerely,

Mark A. Smith
Manager